

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	CRIMINAL NO. 03-10344-DPW
)	
BRUCE GORDON HILL,)	
)	
Defendants.)	
_____)	

UNITED STATES' SUPPLEMENTAL PROPOSED VOIR DIRE QUESTIONS

In addition to the Court's customary introduction to the jury, the United States requests that the Court ask prospective jurors the following voir dire questions:

1. Have you, a family member, or someone close to you ever been involved in a criminal case as either a victim, a witness, or a person charged with a crime?
2. Are you, a family member, or someone close to you involved in the criminal justice system as a prosecutor, a defense attorney, or an employee of either a prosecutor or a defense attorney?
3. Are you, a family member, or someone close to you employed by any law enforcement agency?
4. Do you have any religious or personal beliefs that would preclude you from sitting in judgment on a fellow citizen?
5. Are you, a family member, or someone close to you employed by any securities regulator, such as the Securities and Exchange Commission or the Massachusetts Secretary of State Securities Division?

6. Are you, a family member, or someone close to you trained as an accountant or auditor?

7. Are you, a family member, or someone close to you employed by the law firm of Hale & Dorr?

8. This case involves charges that the defendant participated in an accounting fraud in connection with the financial reporting of the former Inso Corporation, which was headquartered here in Boston. Have you read or heard anything about this matter?

9. Have you, a family member, or someone close to you been involved in any securities investigation or been a plaintiff or a defendant in any securities litigation, such as a class action or other case relating to corporate financial reporting?

10. Are you familiar with any of the individuals on either the United States' or the defendant's witness lists?

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

dated: April 29, 2005

By: /s/ Paul G. Levenson
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